

[name of deponent] \_\_\_\_\_ # \_\_\_\_\_  
[date affidavit is sworn] \_\_\_\_\_

Form 111 (Rule 25 (6)) S.C. No. \_\_\_\_\_

## SUPREME COURT OF YUKON

Between

Plaintiff/ Petitioner

and

Defendant/ Respondent

### AFFIDAVIT OF DOCUMENTS (Other than Individual)

I, [name, address, and occupation of deponent] \_\_\_\_\_,  
MAKE OATH (OR SOLEMNLY AFFIRM) AND SAY THAT:

1. I am the [state the position held by the deponent] \_\_\_\_\_, of [name of party] \_\_\_\_\_.
2. I have conducted a diligent search of the records of [name of party] \_\_\_\_\_ and made appropriate enquiries of others to inform myself in order to make this affidavit. This affidavit discloses, to the full extent of my knowledge, information and belief, all documents relating to any matter in issue in this action that are or have been in the possession, control or power of [name of party] \_\_\_\_\_.
3. I have listed in Schedule A those documents that are in the possession, control or power of [name of party] \_\_\_\_\_ and that it does not object to producing for inspection.
4. I have listed in Schedule B those documents that are or were in the possession, control or power of [name of party] \_\_\_\_\_ and that it objects to producing because it claims they are privileged, and I have stated in Schedule B the grounds for each such claim.
5. I have listed in Schedule C those documents that were formerly in the possession, control or power of [name of party] \_\_\_\_\_ but are no longer in its possession, control or power, and I have stated in Schedule C when and how it lost possession or control of or power over them and their present location.

6. [Name of party] \_\_\_\_\_ has never had in its possession, control or power any documents relating to any matter in issue in this action other than those listed in Schedules A, B and C.

SWORN (OR AFFIRMED) before  
me at \_\_\_\_\_, in  
\_\_\_\_\_ on this  
\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

A Notary Public in and for the  
Yukon Territory

Deponent

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#### LAWYER'S CERTIFICATE

I CERTIFY that I have explained to the deponent,

- (a) the necessity of making full disclosure of all documents relating to any matter in issue in the action; and
- (b) what kinds of documents are likely to be relevant to the allegations made in the pleadings.

Dated \_\_\_\_\_

\_\_\_\_\_  
Lawyer

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#### SCHEDULE A

Documents in the possession, control or power of [name of party] \_\_\_\_\_  
\_\_\_\_\_ that it does not object to producing for inspection.

[Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it.]

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## SCHEDULE B

Documents that are or were in the possession, control or power of [name of party] \_\_\_\_\_ that it objects to producing on the grounds of privilege.

*[Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State the grounds for claiming privilege for each document.]*

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## SCHEDULE C

Documents that were formerly in the possession, control or power of [name of party] \_\_\_\_\_ but are no longer in its possession, control or power.

*[Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State when and how possession or control of or power over each document was lost, and give the present location of each document.]*